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10 Attorneys for Defendant SEAGATE TECHNOLOGY, LLC

11  
12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION  
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16 IN RE SEAGATE TECHNOLOGY, LLC  
LITIGATION

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18 CONSOLIDATED ACTION  
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Case No. 3:16-cv-00523 JCS

**DECLARATION OF LIÊN H. PAYNE IN  
SUPPORT OF SEAGATE TECHNOLOGY  
LLC'S MOTION FOR  
ADMINISTRATIVE RELIEF PURSUANT  
TO LOCAL RULE 7-11: (1) TO STRIKE  
PORTIONS OF PLAINTIFFS' REPLY IN  
SUPPORT OF CLASS CERTIFICATION  
MOTION, OR, IN THE ALTERNATIVE  
(2) FOR LEAVE TO FILE A SUR-REPLY**

Underlying Motion Hearing:

Date: March 30, 2018  
Time: 9:30 a.m.  
Dept.: Hon. Joseph C. Spero  
Courtroom G, 15th Floor


1 I, Liên H. Payne, declare as follows:

2 1. I am an associate with the law firm of Sheppard, Mullin, Richter & Hampton LLP,  
3 counsel of record for Defendant Seagate Technology LLC in the above-captioned matter. I am  
4 duly admitted to practice before this Court. I have personal knowledge of the facts set forth in this  
5 declaration, and, if called as a witness, could and would competently testify to their truth.

6 2. In an email chain dated February 27, 2018, I met and conferred with Plaintiffs'  
7 counsel before submitting Seagate's motion for administrative relief which this declaration  
8 accompanies. The parties were unable to reach an agreement to stipulate to the filing.

9 I declare under penalty of perjury under the laws of the United States that the foregoing is  
10 true and correct.

11 Executed on February 27, 2018 in San Francisco, California.

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14   
15 Lien H. Payne